

Message

From: Huser, Jennifer [Huser.Jennifer@epa.gov]
Sent: 5/16/2019 6:59:24 PM
To: Feldman, Michael [Feldman.Michael@epa.gov]
Subject: comment summary for opt in

Comments on Opt-in Provision

Comment: We received comments regarding the opt-in provision to the SO₂ trading program. AEP and NRG Texas support EPA's retention of provision 40 CFR § 97.904(b) that provides the opportunity for certain units to opt-in to the Texas SO₂ trading program. AEP also supports the EPA's identification of sources covered by the SO₂ trading program. AEP additionally states that allowing additional units to opt-in provides trading opportunities and would facilitate a more robust trading program, and participation by additional units could minimize the concern expressed by some of the risk of shifting generation from covered to non-covered sources. NRG Texas supports excluding Parish Unit 8 from the SO₂ trading program as long as the opt-in provision is maintained.

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